

benchmark price which would represent the average price charged across the Nation.⁴⁸

EDLINC's reason for suggesting such an approach appears to be a concern about the differences that exist in total charges for services offered in different parts of the country. Although total charges for a service can vary from location-to-location and company-to-company, there are generally several factors, predominantly costs and State-specific regulatory policy, which account for these legitimate price differences. Limiting the reimbursement provided to the carrier to some assumed or imposed price would also violate Section 254(h)(1)(B) of the Act.

A few commenters suggest that the Commission requires schools and libraries to re-issue competitive bids for existing services.⁴⁹ The Commission is not authorized to void or to insert new terms into any contracts, especially for intrastate services. Such an action is clearly inappropriate and unnecessary, and would only further complicate what is likely to become a hugely bureaucratic process when this program begins. Such a recommendation may over-burden many schools and libraries that may not be initially prepared to deal with the competitive bid process. Schools and libraries that have already purchased services, many through previous competitive bids, will receive the proposed discounts and will immediately benefit from this program. There is no need to impose such a mandate where the limited benefits, if any, will not outweigh the burden placed on schools and libraries.

Some commenters call for the inclusion of institutions other than public libraries and

⁴⁸ EDLINC, p. 6.

⁴⁹ See ALTS, p. 15; TCG, p. 8.

elementary and secondary schools. For example, some parties argue that community colleges should be eligible for discounted services.⁵⁰ Regardless of the arguments made, the Act is very clear that only not-for-profit elementary and secondary schools with endowments of \$50,000,000 or less are eligible to receive the benefits resulting from Section 254(h).⁵¹ The Commission has no authority to re-write the legislation by expanding this precise definition.

If the Commission intends to permit consortia, then AT&T's recommendation to "limit the permissible consortia to those including eligible schools, eligible libraries, and municipalities"⁵² has considerable merit. SBC agrees with AT&T's statement that "[c]onsortia create an enormous potential for abuse and for circumvention of Section 254(h)(3)'s prohibition on resale of discounted services."⁵³ While SBC recognizes the public policy benefits of permitting consortia, the Commission should balance these benefits against the administrative costs of enforcing the Act's clear prohibition against resale.⁵⁴

Some commenters point out that it is more reasonable for consortia of eligible and non-eligible institutions to be responsible for managing their own recordkeeping to assure proper use

⁵⁰ See American Association of Community Colleges/Association of Community College Trustees, pp. 4-12; U.S. Department of Labor, Secretary Robert B. Reich.

⁵¹ See 47 U.S.C. 254(h)(4), 254(h)(5).

⁵² AT&T, p. 22.

⁵³ AT&T, p. 23.

⁵⁴ 47 U.S.C. 254(h)(3).

and allocation of the discounted services.⁵⁵ Members of the consortia are in the best position to manage this process and should be responsible for the proper use of the services to ensure that non-eligible institutions are not receiving the benefits of the Act's discount framework. It is not reasonable to place this responsibility on the carrier as the Joint Board has proposed.⁵⁶

Finally, TCG stated its opposition against using NECA as the interim administrator overseeing the fund for the discounts to schools and libraries.⁵⁷ There is no legitimate problem with NECA serving in that capacity if the Commission determines that an interim administrator is fiscally appropriate.

IX. THE COMMISSION SHOULD ADOPT ONLY THOSE REGULATIONS RELATED TO HEALTH CARE THAT ARE NECESSARY TO MEET THE NEEDS OF THE HEALTH CARE COMMUNITY WITHIN THE PARAMETERS ESTABLISHED BY THE ACT

A number of commenters, including health care providers, demonstrate that telecommunications services with transmission speeds of 1.544 Mbps are more than sufficient for providing the medical services needed for patient care.⁵⁸ The Nebraska Association of Hospitals and Health Systems states that "[s]upporting bandwidth greater than 1.544 Mbps would appear to

⁵⁵ For example, see BellSouth, pp. 38-40; Pacific Telesis Group, pp. 52, 53.

⁵⁶ Recommended Decision, para. 596.

⁵⁷ TCG, p. 12.

⁵⁸ For example, see American Hospital Association, p. 5; American Medical Colleges, p. 2; American Telemedicine Association, p. 2; Ameritech, pp. 24, 25; AT&T, p. 23; BellSouth, p. 41; Good Samaritan Health System, p. 3; Kansas Hospital Association, p. 2; MCI, p. 19; Nebraska Association of Hospitals and Health Systems, p. 2; WorldCom, p. 31.

offer relatively small additional return in improved health care to the rural residents.”⁵⁹ The Kansas Hospital Association adds “[t]he relative costs, we believe, would be higher than the benefits of supporting bandwidths higher than 1.544 Mbps through universal service provisions.”⁶⁰ There is no evidence provided that demonstrates a requirement for transmission speeds greater than 1.544 Mbps.

No commenter offers any credible justification supporting an infrastructure build-out. The difficulties of managing such an effort far outweigh any perceived benefit. The determination of what technologies should be deployed and for whom those technologies should be deployed is better left to the marketplace. Carriers should be allowed to continue to work with health care providers to determine the technologies and services that will best serve their needs.

The Act states that rural health care services are to be provided at rates that are reasonably comparable to rates charged in urban areas.⁶¹ The Act does not imply that the rural health care provider’s total bill is to be equal to a total bill for an urban health care provider. It does, however, imply that each rate assessed on a rural health care service is to be reasonably comparable to the equivalent urban rate. With today’s average pricing constructs, many rates are already equivalent between urban and rural areas. Where they are not, the Joint Board’s recommendation to charge a rate equal to the highest tariffed or commercially available rate in the

⁵⁹ Nebraska Association of Hospitals and Health Systems, p. 2.

⁶⁰ Kansas Hospital Association, p. 2.

⁶¹ 47 U.S.C. 254(h)(1)(A).

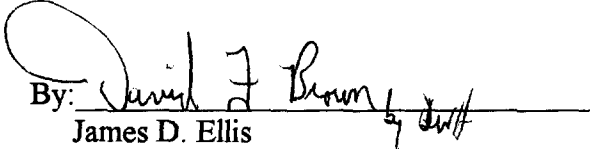
nearest large city is a reasonable way to ensure rural and urban comparability of rates. And, as WorldCom points out, the Commission's newly-imposed rules on rate integration and geographic averaging will also help alleviate these concerns.⁶² It is unnecessary and beyond the confines of

⁶² WorldCom, pp. 32, 33. See FCC Rule 64.1701; *Policy and Rules Concerning the Interstate, Interexchange Marketplace Implementation of Section 254(g) of the Communications Act of 1934, as amended*, CC Docket No. 96-61, Report and Order, FCC 96-331, 11 FCC Rcd 9564 (1996).

the Act to attempt to eliminate distance and usage-based rates from any carrier's pricing structures, especially for intrastate services.

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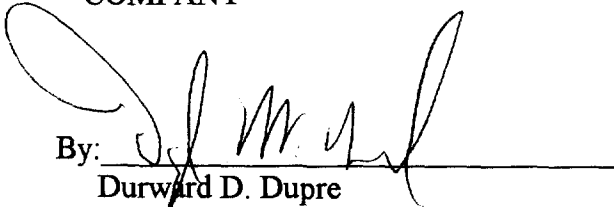
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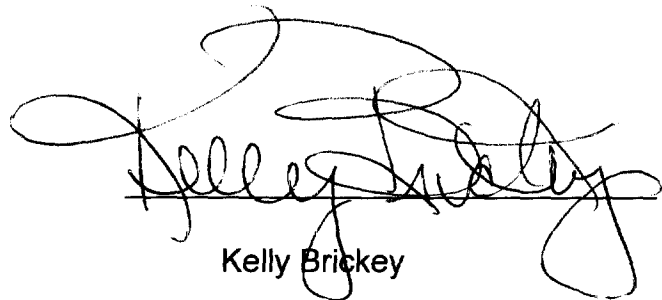
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